

supporting xDSL-based services.”¹⁵³ It is at the pre-ordering stage where DSL providers (both competitors and incumbents) determine whether or not the loop facilities that serve their potential customers are capable of carrying DSL services, and if so, what type. In reaching this determination, DSL providers must assess the characteristics of a loop, and in particular, whether or not the loop contains load coils, repeaters, bridged taps, DLC systems, DAMLs and pairgains. In addition, DSL providers must also consider the length and wire gauge of the loop.

All of this information is a part of OSS, and indeed lies currently in ILEC databases and systems. In fact, ILECs access this information in order to provide their DSL services. Moreover, without this information in a real-time electronic format, DSL providers cannot effectively react to their customers’ needs at the same time the incumbent is able to react to its own customers. As the Commission well knows, the ability to match the incumbent’s services in timely delivery is key. “If it takes longer to provision service to customers of a competitive carrier, the competitor will lose business to the LEC.”¹⁵⁴ If competitors are not able to access information via OSS at the same time that the incumbents are able to access that information, competitors reaction to this information will be slower than that of the incumbent, and this delay will create the false impression to customers that competitors’ services are inferior. Denial of OSS parity “introduces errors, causes delays and uncertainty that both discourage customers from choosing a CLEC and undermine CLEC marketing campaigns, and creates a negative image for customers, all of which inflate CLECs’ customer acquisition costs.”¹⁵⁵ Unquestionably, these are adverse effects that would result in lost sales and impair competitors’ services.

¹⁵³ *Memorandum Opinion and Order* ¶ 56

¹⁵⁴ California Public Utilities Commission Comments

¹⁵⁵ MCI Comments at 69.

5. Real-Time, Electronic OSS Access Is Required
for Competitors to Have an Equal Opportunity
to Compete with the ILEC

GTE maintains that competitors should not have “retail use of ILEC OSS” in order to provide service to their customers.¹⁵⁶ In support, GTE points to the fact that there are multiple OSS vendors and that CLECs can purchase these systems in order to serve their customers.¹⁵⁷ The error in this argument is that it presents the vendor-provided ability of competitors to create their own interfaces as substitute for the key information that is contained with ILEC OSS systems.

Competitors’ own OSS systems cannot possibly contain the information that the ILECs’ OSS systems contain, which is essential to be able to offer services. As discussed previously, it is very important that competitors have the ability to review loop make-up information while interacting with their customers in order to determine whether the loop is capable of DSL services, and if so, to inform that customer of the expected service capabilities and delivery dates. No OSS provided by a competitive vendor will have this loop make-up information, as the information is ILEC-generated based on the ILECs’ design and maintenance of its own equipment.

Similarly, as COMPTTEL states, ILEC OSS is necessary to access maintenance histories and service interval information.¹⁵⁸ Again, none of this information would be available in a commercial ILEC OSS system. There is just no way of circumventing the fact that much of the OSS information that competitors need to access is ILEC owned and ILEC specific, and that only way to access this information is via the incumbent’s OSS. Moreover, just as the ILEC uses

¹⁵⁶ GTE Comments at 71,

¹⁵⁷ GTE Comments at 71

¹⁵⁸ COMPTTEL Comments at 45

this key information that is only available to the ILEC in order to serve its retail customers, so too should competitors be able to use the same information to serve its retail customers.

E. Incumbent LECs Must Unbundle Advanced Services Equipment in Central Offices, Remote Terminals and Controlled Environmental Vaults in Which Competitors Have Been Denied Collocation of Their Own Advanced Services Equipment.

Several commenters have argued that digital subscriber line access multiplexers (“DSLAMs”), used for the provision of advanced services, should not be unbundled.¹⁵⁹ Several of the ILECs concur that a general matter, DSLAMs are “freely available at market prices from sources other than incumbent LECs.”¹⁶⁰ As a major purchaser of DSLAMs, Rhythms agrees that DLSAMs should not — except in the limited situations outlined here and in our initial comments— be subject to mandatory unbundling.

DSLAMs are not proprietary elements,¹⁶¹ and as such the determination of whether they must be unbundled is governed by the “impair” standard. In most instances competitors’ services will not be impaired if they are denied access to the ILEC’s DSLAMs. This equipment is available from a variety of competitive vendors and competitors have been able to purchase DSLAMs. DSL providers purchase DSLAMs and locate them at the end of their customers’ copper loops at the ILEC facilities in order to provide service.

There are, unfortunately, a few instances where competitive DSL providers are not able to install their own DSLAMs at the end of the copper loop at the ILECs facilities. Specifically, competitors are unable to install their own DSLAM equipment when the incumbent has

¹⁵⁹ Ameritech Comments at 124; Bell Atlantic Comments at 40; BellSouth Comments at 32-33; SBC Comments at 73; US West Comments at 58.

¹⁶⁰ Similarly, Bell Atlantic states that “[c]ompetitive DSL suppliers are thriving using their own network equipment (DSLAMS).” Bell Atlantic Comments, Crandall Declaration at 23. Also, the Ohio Public Utilities Commission has argued that ILEC provisioning of DSLAMs would actually require “network improvement or network modification.” Ohio PUC Comments at 16.

determined that there is no space inside of a central office, a remote terminal or controlled environmental vault for a CLEC to collocate this equipment. However, DSL providers need to be able to install equipment in these locations because it is at these locations where providers access the end of customer's copper loop. Because DSL service requires access to the copper loop, the inability to access a location to place a DSLAM at the end of the loop is a significant impediment. The instance where this most often occurs is when competitors seek to place their equipment in DLC vaults, where the end of the customer's copper loop meets fiber transmission. However, when competitors have attempted to place their DSLAMs in these locations, ILECs have denied competitors this ability. Because DLC systems prevent the deployment of most DSL technologies, DSL providers (CLECs and ILECs) must find a way to access the end of the copper loop that serves these customers. In absence of the ability to place their own equipment at the DLC vault or other exhausted collocation facilities and remote terminals, the competitors have no other choice but to use the ILECs' DSLAM already located in those vaults, offices and terminals. As NorthPoint states, "where loops and collocation are unavailable to a requesting competitive LEC . . . it is impossible for competitive LECs to serve end-users."¹⁶² Thus, in order to offer services to customers served by DLC systems, competitors must connect with a DSLAM already in the vault, namely the ILECs' DSLAM.

CONCLUSION

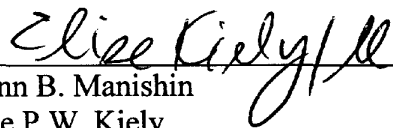
In order to ensure competition, particularly in the advanced services market, the Commission should establish a nationwide minimum list of unbundled network elements.

¹⁶¹ As Rhythms indicated in its initial comments, DSLAMs are manufactured and sold by commercial vendors and are available to any carrier.

¹⁶² NorthPoint Comments at 18.

Specifically, the Commission should require ILECs to provide loops, including the features and functionalities of xDSL-capable loops, NIDs, transport facilities and OSS.

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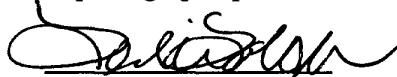
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